



State of Ohio Environmental Protection Agency

Northeast District Office

2110 E. Aurora Road
Twinsburg, Ohio 44087-1969
(216) 425-9171
FAX (216) 487-0769

US EPA RECORDS CENTER REGION 5



526387

George V. Voinovich
Governor

September 21, 1993

RE: HUKILL CHEMICAL CORP.
OHD 001 926 740
#02-18-0315
CUYAHOGA COUNTY

CERTIFIED MAIL

Mr. Robert L. Hukill
President
Hukill Chemical Corporation
7013 Krick Road
Bedford, Ohio 44146-4493

Dear Mr. Hukill:

On August 24, 1993 and September 2, 1993, the Ohio Environmental Protection Agency (EPA) conducted a compliance evaluation inspection of the Hukill Chemical Corporation (Hukill), located at 7013 Krick Road, Bedford, Ohio. The purpose of the inspection was to evaluate the facility for compliance with state and federal hazardous waste regulations. The Ohio EPA was represented by Marlene Emanuelson and Kristen Switzer. Gordon Garcia of U.S. EPA was present during the August 24, 1993 portion of the inspection. Hukill was represented by Ed Price both days of the inspection. Other representatives of Hukill were Mike Mraz, Dorene Kray and you. I have enclosed copies of the inspection checklists for your records.

The following violations were noted during the inspection:

1. Rule 3745-65-35 of the Ohio Administrative Code (OAC):
Required Aisle Space.

Drums of waste in the container storage area (East Warehouse) were placed too close together to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and/or decontamination equipment, as is required by this rule.

To abate this violation, please submit a photograph of the East Warehouse container storage area that shows that proper aisle space is now being maintained.



2. Rule 3745-67-50 of the OAC: Waste piles.

Owners or operators of facilities that treat or store hazardous waste in piles must meet the requirements of rules 3745-67-50 to 3745-67-69 of the OAC.

Hukill does not have a permit to treat or store hazardous waste in a pile. However, at the time of the inspection, a plastic covered soil pile was noted. The excavated soil was from part of an earthen dike that had surrounded one of the tank farms and was moved to facilitate work being done in a product tank storage area. This tank farm area is to be closed as a landfill per approval of the submitted RCRA closure plan.

To abate this violation, Hukill must either place the soil into a covered roll off box or place the soil back from where it was excavated.

3. Rule 3745-65-16(D)(2) of the OAC: Personnel Training.
(Violation Abated)

NA
Review of personnel files during the inspection showed that one of the employee files was missing the corresponding job description for that position. This violation was abated during the September 2, 1993 inspection by including the job description in the employee's file.

Please respond to the violations listed within 30 days of receipt of this letter. Failure to list specific deficiencies that may have been overlooked in this communication does not release Hukill from compliance with all applicable hazardous waste regulations. Please be advised that past or future instances of non-compliance can continue as subjects of pending or future enforcement actions.

The Ohio EPA strongly encourages pollution prevention as the preferred approach for waste management. The first priority of pollution prevention is to eliminate the generation of wastes and pollutants at the source (i.e. source reduction). For those wastes or pollutants that are generated, the second priority is to recycle or reuse them in an environmentally sound manner. You can benefit economically, help preserve the environment and improve your public image by implementing pollution prevention programs.

Mr. Robert L. Hukill - Hukill Chemical Corporation
September 21, 1993
Page Three

For more information about pollution prevention including fact sheets or the U.S. EPA's "Facility Pollution Prevention Guide" (EPA/600/R-92/088), please contact the Ohio EPA's Pollution Prevention Section at (614) 644-3469.

Should you have any questions, please do not hesitate to call me at (216) 963-1162.

Sincerely,



Marlene Emanuelson
Environmental Scientist
Division of Hazardous Waste
Management

ME/fwn

cc: Frank Popotnik, DHWM, NEDO
Laurie Stevenson, DHWM, CO